

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

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| In the matter of |) | |
| |) | |
| Amendment to Part 97 of the Commission's |) | |
| Amateur Radio Service Rules to Eliminate |) | RM-10785 |
| Morse Code Proficiency Requirements For |) | |
| All Classes of Amateur License |) | |

To: The Commission

COMMENTS OF DANIEL J. MEIER

1. I am an Amateur Extra Class license holder with call sign KB9AX. I have been associated with amateur radio since 1969 and therefore have an interest in the direction this hobby takes. The current petition before the commission does not properly represent the feelings of the most active HF users. I agree that Morse code testing should not be the defining barrier to HF privileges, but just eliminating it as a requirement will cause harm to the purpose of amateur radio.

2. Most of the petitions and comments to date compare the use of telegraphy in amateur radio with how it had been used commercially. We must keep in mind that by its very nature, amateur radio was meant to be a non-commercial hobby. Since commercial interests must always look for a more efficient and reliable means of communications to stay competitive, their elimination of telegraphy as a means of communications is easily understood. Satellite based international distress systems are more efficient than HF based systems. During the last 30 years the commission has aided the development of very complex infrastructures that today allow very efficient communications to any part of the globe. The original purpose of amateur radio has also gone through several changes in the last 75 years. During World War 1 and World War 2 the amateur community contributed many skilled radio operators and technologists to the military and communications industry. Recently we have contributed to disaster relief efforts and started many youth on a career in technology. No other Service

under the FCC represents such a diverse non-commercial group than amateur radio. It is for this reason that I feel the current rationale presented before the commission fails to take into account the true meaning of amateur radio.

3. Other comments have put forth the example that the current Technician Class license has become the accidental entry level to amateur radio. I agree with those comments. I won't expand on others' comments in this regard, but I do wish to concur with their statements. The privileges associated with this license are not fitting with what an entry level license needs to offer. I agree that a new entry level license is needed to keep the amateur radio community healthy and viable. I don't agree that all Morse testing must be dropped and I will expand on that statement later.

4. The HF spectrum is different in many ways to any other portion of the spectrum controlled by the commission. Improperly maintained transmitters and equipment can cause world wide interference to any other users of the HF spectrum. It is this reason that our testing standards for amateur radio need to be improved. Any entry level license needs to help ensure that all operators of HF radio gear are capable of knowing when that equipment is operating properly. This was the original intent of the technical examinations given to both commercial and amateur operators. In recent years many have forgotten this, and the question pools and testing for amateur radio have not kept pace with the changes in technology and test and measurement techniques available today. The tests have properly kept up with changes in rules and regulation that are also an important part of guaranteeing that all users of the HF spectrum can co-exist without unnecessary interference. Any new entry level license will need to help provide conditions for the new licensee to experiment and learn what is needed before graduating to a higher class of license. Special sub-bands similar to those granted for the old Novice class license, along with power limits to minimize the chances of problems are needed. These sub-bands and power limits should overlap existing phone bands to allow the exchange of information with more experienced operators. Even with mostly commercially built transceivers in use today the chances of component failure and improper adjustments are still there.

5. The petition presented by the NCVEC represents Morse telegraphy as just another mode, like SSB, PSK31, and many others. This is an overly simplistic view of the world. Their comparison to commercial reasons for no

longer using telegraphy and the adoption of those interests of more reliable infrastructures does not hold up to the true nature of amateur radio. For amateur radio to exist, we need people with a desire to get into the hobby for whatever their personal reasons. We must also show a benefit to the government issuing the license. The ARRL and others have done an excellent job of providing examples of our use in disasters and emergencies. We are also a starting ground for many that wish to pursue a career in technology. I for one started in amateur radio as a freshman in high school. I joined the US Army as a skilled radio operator and my knowledge gained as an amateur radio operator allowed me to modify procedures on many occasions to improve the communications effectiveness of our equipment. After the service I went on to complete my PhD in Electrical Engineering and now work in a high technology company. I only point this out to remind the commission that amateur radio is still a pool of talent for its licensing government. This talent can extend from radio propagation knowledge to the skill of sending and receiving Morse code. To be able to predict the scope and level of an emergency or disaster is never going to be done. All we can do is rely on our pool of talent. This pool of talent may be needed to talk on a radio. It may just as easily require an individual to cobble together a working piece of equipment out of damaged infrastructure systems. Knowledge of Morse code may be the only method of communications at that point. Morse can be sent by flashlight, while no other skill currently learned in the field of radio communications can make that statement. I say this only to point out that there is a reason to maintain a pool of talent that can provide this service. There will still need to be an incentive to learn Morse code, so keeping most of the current CW sub-bands and allowing for at least a 5 wpm test to upgrade to Extra Class privileges is in the interest of our government. Morse code should not be a requirement for an entry level license, but knowledge of it as a mode should be included in the written tests.

6. The argument that Morse testing is an undue burden on the examiners and disrupts other applicants is laughable. Anyone can solve a problem by creating another problem of equal or greater magnitude. This seems to be the approach taken by the NCVEC. If they are so burdened by providing testing, than they should find different volunteers. Testing could easily be changed to be given the same way FAA testing is provided, by computer testing centers located at hundreds of flight schools around the country. A telephone circuit or computer could be used to give a simple automated 5 wpm test. Also, headphones could easily solve the issue of bothering other

applicants. Problem solving has always been a valued trait of most amateur radio operators, but I feel the NCVEC has forgotten this.

In Summary

The Amateur Radio Service is a not a commercial entity. Our use of outdated modes and new experimental modes of communications are there to provide a pool of talent to our government and its technology industry. It is with this backdrop that I hope you consider my remarks. Most of the HF spectrum is busy with activity, and the recent events of September 11th have reminded us of how fragile our infrastructure can be when something happens that we didn't plan for. The skills and determination of our citizenry have always been a strength of the United States. Amateur radio will need to make changes in its licensing structure to accommodate our changing needs. I also hope the FCC sees the need of providing a mechanism to maintain a pool of Morse code operators and protect the HR spectrum from undue interference. It is the diversity of our skills as amateur radio operators that makes us so valuable, not how up to date our modes of transmission are.

Respectfully submitted,

Dr. Daniel J. Meier PhD
3918 Knob Creek Overlook
Indianapolis, Indiana 46234